

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Owen-Withee School District **Agency Code:** 104207

School(s) Reviewed: Owen-Withee El

Review Date(s): 1/17/17-1/19/17

Date of Exit Conference: 1/26/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.
 - Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP57-2016 Unpaid Meal Charges guidance Q&A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Owen-Withee for the courtesies extended to us during the review. Staff were available to answer questions and were receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. Records were easily accessible and well organized expediting the onsite review for all.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Once received, applications are reviewed, determinations made, and families are notified of their status well within the required 10 operating days. This means students are receiving meal benefits quickly and the SFA is taking steps to minimize the potential for accrual of negative meal balances.
- Direct Certification runs are completed as required and more often to increase student matches.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- 179 eligibility determinations were reviewed, no errors were identified. Great job!

Annual Income

- If the household provides only annual income, the LEA must follow up with the household to ensure that the amount is an accurate reflection of the household's current income.

Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits as part of the USDA Child Nutrition Programs.
- The agency must seek written consent from the parent or guardian by program to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>. A best practice alternative is to have parents self-disclose for outside programs by bringing in a copy of their free and reduced approval letter.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>. This form should also be on file for individuals that access student eligibilities for state/federal non-program reporting (no prior parental consent required). Keeping this on file is as an agreement to only use data for carrying out these specific program reporting tasks.

Verification

- No errors, great job!

Meal Counting and Claiming

- No errors, great job! Breakfast and lunch service were observed by reviewers. All students had reimbursable meals. The cashier does a wonderful job checking trays and encouraging students to take necessary items in a positive manner.
- Participation in the lunch program is excellent! The agency is capturing ~77% of their student population. Students built full/varied trays with many fruits and vegetables. Food looks fresh and well presented. Staff interact pleasantly with students. All of these things contribute to the results of high participation and help our nation reach core objectives outlined in the Dietary Guidelines for Americans.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

The food service director at Owen-Withee Elementary is doing a fantastic job of planning varied, healthy menus for students to enjoy. All of the food service staff at the school do a wonderful job; the serving line was appealing and clean, and staff went the extra mile by placing colorful printed fabric underneath the fruits and vegetables on the garden bar, which made the presentation even more attractive. A wonderful variety of fruits and vegetables are regularly offered, and students surely seem to enjoy their meals. All of the food service staff exhibit great teamwork and should be commended for their efforts.

Comments/Technical Assistance/Compliance Reminders

- **Signage:** The signage posted inside the kitchen does not accurately reflect the Offer versus Serve (OVS) requirements for all grade groups. All students in grades K-12 must take ½ cup of fruit and/or vegetable at both breakfast and lunch in order to have a reimbursable meal. After discussing this matter with the food service director during the on-site review, these signs were corrected right away; thank you!
- **Vegetable Subgroups:** Some vegetables included on the garden bar production record were written under incorrect subgroups. The following vegetables all fall into the “other” vegetable subgroup: celery, cucumber, green pepper, pea pods, cauliflower, onion, kohlrabi, and radishes.

Findings and Corrective Action Needed

✓ **Finding #1:** There was no CN label or Product Formulation Statement (PFS) for the meatloaf served during the week of review. Without crediting documentation from the manufacturer, processed products may not be credited towards the school meal programs. Please discontinue serving this product. USDA has a database of products that have a CN label at this website: <https://www.fns.usda.gov/cnlabeling/authorized-manufacturers-and-labels>. The information in this database is not sufficient crediting documentation, (you must still keep the actual CN label on file) but it is a helpful tool you may use when searching for new products to add to your menu. More information on CN labels and PFS can be found on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>.

Corrective Action Needed: Please submit the CN label or PFS for a new product that will be served in place of the meatloaf. *The CN label for the Salisbury steak that will be served instead was submitted during the on-site review; no further action needed. Thank you!*

✓ **Finding #2:** During the week of review, the cinnamon twist served at breakfast and the dinner roll served at lunch were not whole grain-rich. A simple way to tell if a product is whole grain-rich is to look at the first ingredient, which should generally include the word “whole,” such as “whole wheat flour,” “whole corn,” or “whole oats.”

Corrective Action Needed: Please submit the nutrition facts label and ingredient list for:

- Dinner roll – *Information was submitted prior to the on-site review; no further action needed. Thank you!*
- Cinnamon Twist – *Information for a new cinnamon roll product was submitted during the on-site review; no further action needed. Thank you!*

❑ **Finding #3:** During the week of review, the ½ cup weekly bean/pea/legume requirement was not met, as only ¼ cup of beans/peas/legumes were offered. Please see the lunch meal pattern table for a reminder of the requirements: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf>. A list of vegetables in each subgroup can be found here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>.

Corrective Action Needed: Please submit one week of completed production records (for the main lunch line and garden bar) to show that the ½ cup bean/pea/legume vegetable subgroup requirement is met.

❑ **Finding #4:** There was a weekly grain shortage during the week of review. Students in grades K-8 must be offered a minimum of 8 ounce equivalents (oz eq) of grain per week, and the week of review only provided 7 oz eq grain.

Corrective Action Needed: Please submit a written statement explaining how you will fix this specific menu week to meet the weekly grain requirement.

3. RESOURCE MANAGEMENT

Commendations

Financial tracking systems (software, excel spreadsheets, and internal accounting records) to support numbers within the Food Service Annual Financial Report were well documented and easy to follow. This was evident when asking staff to pull records and support calculations on the nonprogram food revenue tool.

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

- The agency’s Child Nutrition program Report, which provides a compilation of meals claimed and reported revenues and expenditures (federal reimbursement received and per meal costs for lunch and breakfast) was reviewed. This report can be accessed through online services (center portal) <http://dpi.wi.gov/nutrition/online-services>. The report may be used to determine the food

cost per lunch, breakfast, and snack and may assist in calculating nonprogram food cost for adult meals when revenues and expenses are properly allocated by program and category.

Annual Financial Report:

- The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- Items noted during the review of the AFR that should be addressed when tracking revenues and expenditures moving forward include:
 - Separate all cost and revenue of nonprogram foods from program foods. Nonprogram foods are items purchased with food service funds that are not part of the reimbursable meal. For Owen-Withee, this includes adult meals, paid student milks sold for Wisconsin School day milk program, catering, and ala carte.

Allowable Costs

- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>. Wisconsin does not allow indirect cost rates to be applied to the food service account. For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, labor, rent, printing and mailing services, administrative oversight, etc. Labor expenditures must be based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits and supported by an annual weekly time study.

Paid Lunch Equity

Great job running this tool!

Revenue from Nonprogram Foods

Thank you for running the USDA Nonprogram food revenue ratio tool. Continue to complete this tool annually and use it to assess nonprogram food prices. Reviewer was able to work through the calculations with staff and estimate adult meal costs, which were left out of the SFAs nonprogram food cost calculation. The adjusted tool results showed a small loss, which will likely be recovered by the 2016-17 SY adult meal price increases that were implemented and the recent reassessment of ala carte/catering prices.

- All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus, nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program Food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food

regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. The district used the *Wisconsin Adult Meal Pricing Worksheet* to assist in pricing 2016-17 SY adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) should be used to determine 2017-18 SY prices because rates are not released until July 1 of each year.

Resources:

- Nonprogram Foods Revenue Rule SP-20-2016 <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
- Nonprogram Foods in a nutshell <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.

Findings and Corrective Action Needed:

Comprehensive Review- Maintenance of the Nonprofit School Food Service Account

- **Finding #1:** Owen-Withee SD is charging a percentage of custodial labor to the food service account, which is not supported by documentation of an annual weekly time study.

Corrective Action Needed: Conduct a time study for one week to determine the correct portion of time/benefits that should be allocated to the food service account. Submit the results of this study via email attachment. Moving forward, the time study must be conducted on an annual basis to support the portion of labor as an allowable Fund 50 expense. Depending on the outcome of the study, regulations require the food service account to be reimbursed for the 2015-16 SY and the current SY.

4. GENERAL PROGRAM COMPLIANCE

Commendations

- The public release was sent to two media outlets and multiple grassroots locations within the community. The agency does a great job promoting the program and the opportunity for families to apply for meal benefits.
- Civil rights training had been attended by all frontline staff and documentation was available for review.

Comments/Technical Assistance/Compliance Reminders:

Food Safety

The last revision of the elementary food safety plan was completed in 2006. The plan should be reviewed at least annually or as often as necessary to reflect changes. The only meal served out of the elementary kitchen/service area is breakfast and should reflect this. I suggest developing the Jr/Sr Hi

food safety plan to incorporate the elementary schools' NSLP menu and operations if they differ from that of the high school.

Civil Rights

Special Dietary Needs

- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements in order to claim the meal for reimbursement. You may use the prototype Medical Statement for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. *Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable.* It is recommended that the SFA develop a clear policy for handling these type of accommodations to ensure that requests are equitable for everyone.
- Consider the use of a singular form to capture all required information in order for food service to carry out these request. The agency has multiple forms on file, some lacking the required components: Signed medical statements must include:
 - A description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and
 - An explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted).

Resources:

Wisconsin DPI Q&A: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>

Wisconsin Medical Statement form: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>

Processes for complaints

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. The form to assist in filing these complaints can be found on the DPI SNT website at https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf

On-site Monitoring

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years.

For more information see USDA memo SP 56-2016

<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.

The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> under the SFA onsite monitoring section.

Local Wellness Policy (LWP)

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

At a minimum, the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A local wellness policy checklist <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf> may be helpful tool to ensure all required components are included in the updated policy. I recommend the district review/draft more specific language related to: inviting the public to be involved, update competitive food language and nutrition standards to align with Smart Snacks standards, incorporating food and beverage marketing, and include a nutrition promotion goal specific to the use of “Smarter Lunchroom” techniques. The food service department can help identify many of the things they are already doing which align with Smarter lunchroom practices.

Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Smart Snacks in Schools

- Several staff members at Owen-Withee School District are doing a great job of working to meet the Smart Snacks requirements. Students who are involved in selling foods and beverages are required to use the Smart Snacks calculator to determine product compliance. This is a wonderful learning tool that teaches students about math, percentages, deceptive labeling of foods and beverages, and nutrition. Keep up the good work!
- At the elementary school, there have been no fundraisers selling foods or beverages this school year. The only source of competitive foods or beverages is the school store; see the corrective action section below.
- Second meals are occasionally sold at the junior/senior high school. Second meals cannot be sold as a unit because the unit would not meet the Smart Snacks nutritional standards. Entrees sold as part of the NSLP and SBP are exempt from Smart Snacks standards on the day of and day after they are served. Fresh, frozen, or canned fruits and vegetables without added fats and sodium are also exempt, as are the milk types/sizes served in the meal programs. Therefore, most items served at lunch or breakfast are exempt from the standards. Foods such as desserts, grain side dishes, and chips will need to be analyzed for compliance since they do not fall under an exemption. All parts of the meal must be analyzed for compliance and priced separately.
- Please see our Smart Snacks webpage for more information on the rule, including our “Smart Snacks In a Nutshell” handout, a link to the product calculator, and tracking tool templates: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Training obtained since April 1, 2015 may count towards training requirements. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers	Other Staff	Part Time Staff
	(20 hrs or more/week)	(less than 20 hrs/week)	
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

Food Safety, Storage and Buy American

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable.

1. Availability: when the product is not produced or manufactured in the U.S. in sufficient and reasonable available quantities of a satisfactory quality.
2. Cost: when responses to solicitations reveal that the cost of a U.S. product is significantly higher than the cost of a comparable foreign product.

A few noncompliant items were identified in storage areas, which should be followed up on and sourced domestically once exhausted: garlic powder (China), Riches Wheat Dough (Canada), and canned peaches (China). Please remind your vendors of the Buy American Provision and work with them to source domestic alternatives. Other noncompliant items found fall under the limited exemptions (Canned Pineapple (Vietnam), fresh bananas (Guatemala).

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

Reporting and Recordkeeping

- As a reminder, original source documents must be retained for the Wisconsin School Day Milk Program after these are entered into the software system. In reviewing the SFAs process, and past records, I have confidence in the counts entered into the Skyward system for the 2015-16 SY claim.

SBP and SFSP Outreach

Owen Withee does an exceptional job promoting the Breakfast and Summer Food Service Programs. This is done through the school newsletter, articles published in the community papers, and reminders through digital messaging boards.

Findings and Corrective Action Needed

☐ **Finding #1:** There is a school store in the elementary school that sells a small amount of foods and beverages to students during the school day. The following products were evaluated for compliance:

Product	Compliant?
Water (8 fluid ounces, plain)	Yes
String cheese (1 ounce)	Yes
Rice Krispies Treats (1.3 ounces)	No – this product needs to be whole grain-rich in order to be compliant. The first ingredient of this product is rice, which is not whole grain. Kellogg’s does make a whole grain-rich Rice Krispies Treats bar with a first ingredient of “whole grain brown rice.”
Juice box (6.75 fluid ounces, 100% juice)	Yes
Mott’s Medleys fruit snacks (0.8 ounce pouch)	No – the first ingredient must be either “fruit juice” or “fruit puree” in order to meet one of the general standards. The first ingredient of this product is corn syrup.

Corrective Action Needed: Please provide a written statement explaining how you will ensure that all foods and beverages sold to elementary school students meet the Smart Snacks guidelines. Please also confirm that you will no longer sell the noncompliant products that are being sold in the schools tore (Rice Krispies Treats, fruit snacks).

- **Finding #2:** Professional Standards hours are not being tracked as required. Per discussion, staff have conducted/attended many internal trainings and DPI school nutrition trainings, but these records were not accessible/supported through a central tracking mechanism.

Corrective Action Needed: Submit a completed tracking tool for all nutrition program staff summarizing completed trainings from April 1, 2015 to current. As a reminder, agendas, sign-in sheets, certificate, etc. must be maintained on file internally to support these trainings. Tracker tools must contain name, hire date, category, Key Areas, Key Topics, training hours and date.

- **Finding #3:** The elementary school food safety plan has not been reviewed/updated annually.
Corrective Action Needed: Submit a timeline of when the plan will be updated. Consider using the checklist (found in the back of the food safety plan) to document the annual review:
http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fdsfty_prf.doc

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

- The Wisconsin School Day Milk Program paper contract agreement is outdated and no longer reflects the actual point of service and program operation practices. Please work with our office to update this paper contract. A contract can be found here:
<http://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc> and emailed to the consultant.
- When completing the Afterschool snack program onsite monitoring reviews, it is not necessary to complete the non-area eligible questions. These do not pertain to OW, as both sites are approved as area-eligible. Other than this section, make sure you are filling this form out completely. Call our office for assistance if you are unsure of question listed on the form to ensure monitoring is conducted in all areas.

Findings and Corrective Action Needed

- ✓ **Finding #1:** Attendance is not being taken separate from the point of service count for the Afterschool snack program as required in <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/qanda-edition3-1999.doc>

Corrective Action Needed: By signing this report, you agree to implement attendance counts and report the average daily attendance (ADA) specific to the ASP on the monthly claim form.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

